

# **EXHIBIT 2**

-----Original Message-----

From: Daniel D. Quick <DQuick@dickinson-wright.com>  
Sent: Thursday, March 20, 2025 10:50 AM  
To: James Allen <james.allen@sbdetroit.com>  
Cc: Peter Doyle <Peter.Doyle@sbdetroit.com>  
Subject: RE: Request for concurrence

Counsel:

It is unfortunate that you being sanctioned and continually losing on your frivolous motions doesn't get the hint from the judge. You clearly have no interest in actual facts. The post that you attach references Clinton's bankruptcy filing, which you have. It does not reference other types of documents that may have been requested in discovery. I have verified this is accurate. As to Dr. Exner, you are intentionally misrepresenting the record. Any communications between Mrs. Worrell and Dr. Exner circa 2018 and as part of her academic paper were not documents provided to an "expert" in this case as referenced in your document request.

Speaking of sanctions, please confirm whether you intend to pay the sanction previously ordered by the court.

Also, I have attached invoices from the experts you deposed. Please confirm you will make prompt payment.

-----Original Message-----

From: James Allen <james.allen@sbdetroit.com>  
Sent: Wednesday, March 19, 2025 5:38 PM  
To: Daniel D. Quick <DQuick@dickinson-wright.com>  
Cc: Peter Doyle <Peter.Doyle@sbdetroit.com>  
Subject: Request for concurrence

The attached was passed to me. This comes from a Facebook account that Judie Worrell controls and postdates the weather event she references as destroying all of her documents. Clearly, she references "cataloguing and unpacking MORE boxes. . .". This does not square with your discovery responses and the testimony of your client that requested documents were destroyed in a weather event shortly after the Worrell's moved to Whatcom County, Washington. Further, Request for Production #2 requested "documents, data and/or information provided to your experts in connection with" our case and the prior NY action. Dr. Exner testified that she relied upon information contained in correspondence exchanged with Ms. Worrell. You stated their were "none". Clearly, that's not true if Dr. Exner's testimony is to be believed.

Recognizing that we are a week away from substantial motion submissions, I write to ask whether you will voluntarily provide the information and documents contained in the boxes and "more boxes" referenced in the attached post and the correspondence and things that were given to Dr. Exner from Ms. Worrell that Dr. Exner referenced in her sworn testimony. If not, please consider this a request for concurrence/meet and confer in a motion to compel and for sanctions. Thank you and have a nice evening.

BOB KOHN  
 PO Box 581  
 SHELTER ISLAND, NEW YORK 11964-0581  
 +1-408-602-5646 [bobkohn@gmail.com](mailto:bobkohn@gmail.com)

March 6, 2025

RE: EXPERT WITNESS SERVICES for March 4, 2025  
*Estate of Worrell v. Thang, Inc.*

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<i>Date</i>	<i>Activity</i>	<i>Hours</i>	<i>Charge</i>
3/4/2025	Expert Witness Depo	6.20	6,045.00
<i>Fees</i>	<i>Sub-total (\$975/hr)</i>	6.20	6,045.00
<i>Expenses</i>			
	None		0.00
	<i>Total Expenses</i>		<b>\$0.00</b>
	<b><i>Total Fees &amp; Expenses this period</i></b>		<b>\$6,045.00</b>
	Due this period		<b>\$6,045.00</b>
	Due from previous period		\$0.00
	<b>Total Due</b>		<b>\$6,045.00</b>

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**ELLEN E. EXNER, PHD**

**INVOICE**

**413-335-6994**  
**ellen.exner@gmail.com**

**531 Dickinson St.**  
**Philadelphia PA**  
**19147**

Attention: Daniel D. Quick  
Dickinson Wright  
2600 West Big Beaver  
Suite 300  
Troy, MI 48084-3312  
Date: 3/10/25

Project Title: Estate of George Bernard Worrell, Jr. vs. THANG, INC., George Clinton, etc.  
Project Description: Expert Witness Deposition  
Invoice Number: 2025.03  
Terms: Upon Receipt

Description	Hours	Rate	Cost
Deposition (03/06/2025)	5	\$500.00	\$2,500.00
		Subtotal	\$2,500.00
		Total	\$2,500.00

Thank you for the opportunity,  
Ellen Exner